

CALIFORNIA CIVIL RIGHTS LAW GROUP

Lawrence A. Organ (SBN 175503)
Navruz Avloni (SBN 279556)
332 San Anselmo Avenue
San Anselmo, California 94960-2664
Telephone: (415) 453-4740
Facsimile: (415) 785-7352
larry@civilrightsca.com
navruz@civilrightsca.com

Attorneys for Plaintiffs,
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT TESLA, INC.'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

Date: December 18, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

[PROPOSED] ORDER

Pursuant to Local Rules 7-11 and 79-5, as well as this Court's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz have filed an administrative motion for an order sealing the physical copies in the Court's files of Exhibits A through S to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion for Summary Judgment. According to the declaration filed by Plaintiffs' counsel, Lawrence Organ, in support of this Motion, Exhibits A through Y should be sealed for the foregoing reasons:

Document	Basis for Sealing
Exhibit A: NS000004	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit B: Deposition of Plaintiff Owen Diaz	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit C: Deposition of Plaintiff Demetric Di-az	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit D: TESLA-0000842 to TESLA-0000843	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit E: CITISTAFF-0000043	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit F: WV000100 to WV00012	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit G: TESLA-0000510	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit H: TESLA-0000511	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit I: TESLA-0000314 to TESLA-0000316	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit J: TESLA-0000060	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit K: TESLA-0000626	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit L: NS000108	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit M: NS000138 to NS0000139	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit N: CITISTAFF-0000050 to CITISTAFF-0000055	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Exhibit O: NS000038-NS000045	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit P: Deposition of Lamar Patterson	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit Q: NS000095 to NS000100	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit R: TESLA0001003 to TESLA0001005	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit S: CITISTAFF-0000001	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Appearing the requested relief is warranted, this Court orders that:

1. Plaintiffs' Administrative Motion to File Documents Under Seal in Support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion for Summary Judgment is GRANTED.
2. The physical copies in the Court's files of Exhibits A through S to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion for Summary Judgment shall be SEALED and remain sealed until further order of the Court.

IT IS SO ORDERED.

DATED: _____, 2019

The Honorable William Orrick
United States District Court Judge